## REMARKS

Prior to the present Amendment, claims 1-4 and 7-20 were all the claims pending in the application. By the present Amendment, Applicant has canceled claim 20 without prejudice or disclaimer. Thus, upon entry of the present Amendment, claims 1-4 and 7-19 will be pending in the application.

Favorable reconsideration and allowance are respectfully requested in view of the remarks set forth below.

### I. Objections to the Specification

In the Final Office Action dated April 21, 2011, the Examiner objected to paragraphs [034] and [036] of the specification because of various informalities. In the Advisory Action dated July 11, 2011, the Examiner indicated that the objection is withdrawn in view of Applicant's amendments to the specification submitted June 21, 2011.

### II. Claim Rejections under 35 U.S.C. § 103(a)

Claims 1-4 and 7-20 are rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,564,215 to Hsiao et al. (hereinafter "Hsiao") in view of U.S. Patent Application Publication No. 2003/0069902 to Narang et al. (hereinafter "Narang"). Applicant respectfully traverses this rejection and respectfully requests that the Examiner reconsider the rejection at least in view of the following comments.

Claim 1 recites:

> A method of validating a request in connection with a content management system having a library server storing an item and a resource manager storing an object associated with the item, said method comprising:
>
> in response to receiving a request that affects the item, recording the request in a library server transaction table, the item

comprising an identifier that identifies a location of the object in the resource manager which is external to the library server;

identifying a version of the item;

determining whether the request affects the object associated with the item, the object comprising a binary object which is stored in at least one of a file system, a file server, a file archive, or a database separate from the library;

identifying a version of the object in response to determining that the request affects the object, by retrieving a timestamp and an identifier for the object;

determining whether the request is valid based on the version of the item and the version of the object; and

in response to determining that the request is not valid, rolling back the request by removing the entry for the request from the library server transaction table.

Applicant respectfully submits that Hsiao and Narang fail to teach or suggest "**identifying a version of the item**" and **"the item comprising an identifier that identifies a location of the object in the resource manager which is external to the library server."**

Hsiao is directed to a system that updates a data object that is maintained in data storage external to a database management system. *See* Hsiao at Abstract. The external data storage includes a Datalink File Manager that includes a File_Version table that contains information about the files stored on the external data storage. For example, Fig. 3 of Hsiao (reproduced below) provides an illustration of the File_Version table.

**FILE_VERSION TABLE**

| ATTRIBUTE | DEFINITION |
|---|---|
| FSID | FILE SYSTEM ID |
| INODE | INODE NUMBER OF THE FILE |
| CELLID | CELL ID |
| UPDATER | USERID |
| PENDING_FLAG | FILE STATUS FLAG |
| LAST_MOD_TIME | LAST MODIFICATION TIME OF THE FILE WHEN LINKED |
| UPDATE_TIMESTAMP | TIME THE FILE IS UPDATED |
| BACKUP_SEQUENCE_NUMBER | FOR GARBAGE COLLECTION |
| URL | FILE IDENTIFIER |
| ARCHIVE_FILE_NAME | ARCHIVE FILE NAME |
| UNIQUE_RECOVERY_ID | UNIQUE IDENTIFIER EMBEDDED IN |
| URL+ | |
| VERSION_NUM | FILE VERSION NUMBER |

The Examiner asserts that the File_Version table of Hsiao teaches "identifying a version of the item… wherein the item comprises a library identifier to a managed resource which is external to a library." However, although the File_Version table may include version information related to particular files, these files are not an "item comprising an identifier that identifies a location of the object in the resource manager which is external to the library server." In other words, the File_Version table of Hsiao merely contains information, such as the version number, relating to a file stored on the external data storage. There is no teaching or suggestion that the file is an identifier that identifies a location of the object in the resource manager which is external to the library server, which is how the "item" recited in claim 1 is defined. Therefore, the files of Hsiao cannot correspond to the "item" of claim 1 such that Hsiao does not teach or suggest "identifying a version of the item" and "the item comprising an identifier that identifies a location of the object in the resource manager which is external to the library server."

The File_Version table of Hsiao also does not teach or suggest "identifying a version of the object in response to determining that the request affects the object, by retrieving a timestamp and an identifier for the object." The Examiner appears to be alleging that the file version number contained in the File_Version table corresponds to both identifying the version of the item and the version of the object. However, the file version number of Hsiao refers to the version of one file, and therefore cannot correspond to the version of an item and an object associated with the item.

Additionally, Appellant respectfully submits that the Examiner does not explain, and the Hsiao reference does not teach or fairly suggest, how information stored in the File_Version

table may be used for "identifying a version of the object in response to determining that the request affects the object, by retrieving a timestamp and an identifier for the object" as required by claim 1.

In the Advisory Action dated July 11, 2011, the Examiner continues to point to the File_Version table as teaching "identifying a version of the item," but does not address the argument that the File_Version table contains information that relates to a version of the file (alleged object), and not to any item.

Accordingly, Applicant respectfully submits that Hsiao does not teach or fairly suggest these claim features. Furthermore, the disclosure of Narang does not cure these deficiencies of Hsiao.

Applicant further submits that Hsiao fails to teach or suggest "**in response to determining that the request is not valid, rolling back the request by removing the entry for the request from the library server transaction table**," as recited in claim 1.

The Examiner points to col. 9, lines 30-33 of Hsiao as allegedly teaching this feature. However, Applicant respectfully notes that Hsiao merely describes deleting a record for a file from the File_Version table, when there is a Reset_Pending request. *See* Hsiao at col. 9, lines 30-33. According to Hsiao, the File_Version table includes information about **file versions**. *See* Hsiao at col. 6, line 65 through col. 7, line 4. The File_Version table **does not include entries for requests/information about library server transactions**, and accordingly, a person of ordinary skill in the art would understand that deleting a record for a **file** from the File_Version table cannot correspond to "removing an entry for the **request** from the **library server transaction table**."

Accordingly, Applicant respectfully submits that Hsiao does not teach or fairly suggest this claim feature. Furthermore, the disclosure of Narang does not cure this deficiency of Hsiao.

Finally, Applicant notes that the Examiner concedes that Hsiao does not teach "in response to determining that the request is not valid," as recited in claim 1, however, the Examiner asserts that Narang teaches this feature. Appellant respectfully disagrees and respectfully submits that Narang does not teach or fairly suggest this feature.

According to Narang, when the last modification time stamp of an object does not match with the last modification time stamp for the latest committed version of the object, an error may be generated to indicate that the handle refers to stale content in the object. *See* Narang at paragraph [0023]. Thus, Applicant respectfully submits that Narang, at best, describes determining that a handle refers to invalid content in an **object**, rather than a **request** being found invalid, as required by claim 1.

In the Advisory Action, the Examiner asserts that accessing an object/file is the same as a request for the object/file. The Examiner, however, appears to ignore the claim language that recites, "receiving a request that affects an item." Applicant respectfully submits that accessing an object/file is not the same as the claimed request that affects an **item**, which comprises a library identifier to a managed resource which is external to a library.

At least for these reasons, Applicant respectfully submits that independent claim 1 is patentable over the combination of Hsiao and Narang.

Independent claims 9, 10, 18, and 119 recite features similar to the features discussed above with respect to claim 1. Accordingly, Appellant respectfully submits that claims 9, 10, and 18-20 are patentable over the combination of Hsiao and Narang at least for the reasons discussed above with respect to claim 1.

Appellant further submits that claims 2-4, 7, 8, and 11-17 are patentable over the combination of Hsiao and Narang at least by virtue of their dependency on claims 1 or 10.

## III. Conclusion

In view of the above, reconsideration and allowance of this application are now believed to be in order, and such actions are hereby solicited. If any points remain in issue which the Examiner feels may be best resolved through a personal or telephone interview, the Examiner is kindly requested to contact the undersigned at the telephone number listed below.

The USPTO is directed and authorized to charge all required fees, except for the Issue Fee and the Publication Fee, to Deposit Account No. 19-4880. Please also credit any overpayments to said Deposit Account.

Respectfully submitted,

/Ryan M. Corbett/

Ryan M. Corbett
Registration No. 63,724

SUGHRUE MION, PLLC
Telephone: (202) 293-7060
Facsimile: (202) 293-7860
WASHINGTON DC SUGHRUE/142133
46159
CUSTOMER NUMBER

Date: October 7, 2011